

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**In re:**

**Hart, Kelvin**

§

**Case No. 17-32743-H1-13**

§

**Debtor(s)**

§

**MOTION TO WITHDRAW AS ATTORNEY FOR THE DEBTOR AND SUBSTITUTE  
REESE W. BAKER AS LEAD COUNSEL**

**THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE HIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THIS MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THIS MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.**

**REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.**

**TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:**

COMES NOW Reese W. Baker attorney for the Debtor(s), and requests the Court to allow him to substitute as lead counsel for Ryan Lott and would show the Court the following:

1. Debtor(s) are represented by the law firm of Baker & Associates.
2. Ryan Lott and Reese W. Baker previously shared responsibility for handling the Debtor's case.
3. Ryan Lott resigned from Baker & Associates on October 27, 2017.
4. Reese W. Baker and Baker & Associates will continue to represent the Debtor(s). This withdrawal and substitution will cause the least disruption for the Debtor(s) in prosecution of this case.

WHEREFORE Reese Baker and Baker & Associates respectfully requests the Court to grant this motion allowing the withdrawal of counsel and substituting Reese W. Baker as attorney for the Debtor(s).

Dated: November 8, 2017

Respectfully submitted,

/s/ Reese W. Baker

**Reese W. Baker**

TX Bar No. 01587700

950 Echo Ln, #200

Houston, Texas 77024

(713) 869-9200

(713) 869-9100 Fax

**CERTIFICATE OF SERVICE**

I hereby certify under penalty of perjury that this Motion and accompanying proposed order are being served on or about November 8, 2017, by ECF/CM by the Clerk of the Court to all parties receiving electronic service. I further certify that a copy of this motion and accompanying proposed order are being served on the Debtor at the following address:

Hart, Kelvin  
21739 Canyon Peak Lane  
Katy, TX 77450

I further certify under penalty of perjury that this motion and accompanying order are being served on or about November 8, 2017, by electronic service by the Clerk of the Court on the Chapter 13 Trustee and US Trustee.

/s/ Reese W. Baker

Reese W. Baker